UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE, Individually and
As Next Friend of JULIE DOE, a minor,

Plaintiffs,

v.

MYSPACE, INC., and
NEWS CORPORATION,

Defendants.

No. 06-cv-7880 (MGC/AJP)

PLAINTIFFS' OPPOSITION TO
DEFENDANT MYSPACE, INC.'S MOTION TO TRANSFER

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ATTORNEYS FOR PLAINTIFFS

Dated: November 6, 2006

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Plaintiffs respectfully request that the Court deny Defendant Myspace Inc. ("Myspace" or "Defendant") Motion to Transfer because:

1. Defendants' fraudulent and negligent misrepresentations were perpetuated in and emanated from this District;

2. Many of the decisions concerning Defendants' security policies (or lack thereof) were made in the Southern District of New York;

3. Defendant New Corp., who owns and operates MySpace, is headquartered in the Southern District of New York and cannot seriously argue that it is inconvenienced by a trial before this Court;

4. Plaintiff's Counsel intends to file interventions on behalf of five additional children, including one plaintiff that resides in New York, that were injured by the same conduct; and

5. It will be more convenient for Defendants to defend a consolidated lawsuit in their home state, instead of defending six different lawsuits spread out in multiple states.

Accordingly, Plaintiffs respectfully request that the Court deny MySpace's Motion to Transfer and allow this important case to proceed.

Respectfully submitted,

By: ______________________

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CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2006, this document was served via facsimile and certified mail, return receipt requested, to the following counsel of record:

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